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May 22, 2005

National Organic Standards Board
c/o Arthur Neil
Room 4008 - South Building
1400 Independence Avenue SW
Washington, DC 20250-0001

Dear NOSB Chairman Jim Riddle,

I want to express full support for the recent Livestock Committee Pasture Requirement recommendations. Enforcement of true access to pasture is necessary so that all organic ruminants receive a significant portion of their total feed intake from pasture. *Lactation is not a "stage of production" during which dairy cows may be denied pasture for grazing!*

I further support these additional recommendations:

1. "Pasture" should be defined as land managed (a) to maintain or improve soil, water, and vegetative resources; and (b) to provide maximum feed value by growing suitable grasses and other forages from which animals graze plant material still connected to its roots.
2. Organic dairy animals, from 12 months of age and up, must consume no less than 30% of their daily dry matter intake from pasture for a minimum of 120 calendar days per year, with a maximum stocking rate of three lactating dairy cows per acre.
3. Farms not in compliance with the above-described recommendations should be allowed one year to come into compliance but will need to file an updated and enforceable farm plan, providing for adequate pasture.

I urge the NOSB to adopt the Livestock Committee Pasture Recommendation and add the above specificity, making true access to pasture a reality on all organic dairy farms.

Sincerely,



Bob Capes



Rita Capes

Members of Wedge Community Co-op (Minneapolis, MN)